U.S. Application No. 09/826,188
Response to Office Action dated June 2, 2005

REMARKS/ARGUMENTS

Reconsideration and withdrawal of the rejections of the application are respectfully requested in view of the amendments and remarks herewith, which place the application into condition for allowance. The present amendment is being made to facilitate prosecution of the application.

I.   STATUS OF THE CLAIMS AND FORMAL MATTERS

Claims 1-33 are pending in this application. Claims 1, 5, 9, 13, 17, 22 and 27-33 are independent. Claims 1, 5, 9, 13, 17, 22 and 27-33 are hereby amended. No new matter has been introduced by this amendment. Support for this Amendment is provided at least at pages 6-14 of the Specification, as originally filed. Changes to claims are not made for the purpose of patentability within the meaning of 35 U.S.C. §101, §102, §103, or §112. Rather, these changes are made simply for clarification and to round out the scope of protection to which Applicants are entitled.

II.   REJECTIONS UNDER 35 U.S.C. § 103(a)

Claims 1-33 were rejected under 35 U.S.C. 103(a) as allegedly unpatentable over U.S. Patent No. 6,249,835 to Isoda (hereinafter, merely "Isoda") in view of U.S. Published Application No. 2001/0048531 to Hisada, which issued as U.S. Patent No. 6,535,300 (hereinafter, merely "Hisada"), in further view of European Patent Publication No. 0,651,556 to Lowitz et al. (hereinafter, merely "Lowitz"). Applicants respectfully traverse the rejection.

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Amended claim 1, recites, *inter alia*:

"A data converter for converting print data transmitted from a printing control unit to a printing unit via a serial bus

...

<u>wherein the judging means and the conversion controlling means provide printing support when there is no printer driver compatible with the printer as a target at the printing controller unit</u>." (emphasis added)

As understood by Applicants, Isoda relates to a system that attempts to improve the total print operation speed of a print system for printing data supplied from a host computer via a communications unit. <u>A rasterization level is determined in accordance with a data transmission capacity of the communications unit</u>, print data is generated at the determined rasterization level, and the generated data is transmitted to the printer. (emphasis added)

As understood by Applicants, Hisada relates to a picture signal processing apparatus and method that determines whether there is an odd- or even-number field signal in the picture signals received, by referring to flags that are turned on or off in accordance with the result of odd- and even-number field detection. In accordance with whether there is an odd- or even-number field signal in the received picture signals, an appropriate image processing operation is selected from the different operations. <u>That is, the received picture signals are processed in a mode suitable to the signals, so as to generate suitable image data</u>. (see Abstract, emphasis added)

As understood by Applicants, Lowitz relates to a device to <u>provide plain paper prints of video images</u>. Lowitz discloses a method and apparatus for processing an input video stream by selecting at least a portion of a frame of the input video stream as printable image data. (see Abstract)

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Applicants' submit that Isoda, Hisada, and Lowitz, taken alone or in combination, fail to teach or suggest the feature recited in claim 1, namely a data converter to "**provide printing support when there is no printer driver compatible with the printer as a target at the printing controller unit.**"

Moreover, Applicants' submit that Isoda, Hisada, and Lowitz, taken alone or in combination, teach away from the invention recited in claim 1. Indeed, the portion of Isoda relied upon by the Examiner to provide a teaching of the claimed data conversion means, recites, in part:

> "After the transmission start signal is sent, the application transmits data in the format of GDI function to GDI. **GDI converts it in the format of DDI function and transmits the data to the printer driver**.
>
> In the present invention, the **printer driver converts the received data in the format of DDI function into PDL or image data** in accordance with the connected interface type and printer type, and sends the converted data to the printer." (see Isoda, col. 4, lin. 13-32, emphasis added)

Applicants respectfully submit that the GDI and printer driver conversion, as disclosed in Isoda, teaches away from a data converter to "**provide printing support when there is no printer driver compatible with the printer as a target at the printing controller unit.**" as recited in claim 1.

Furthermore, Applicants' submit that the combination of Isoda, Hisada, and Lowitz lacks motivation. Indeed, one of ordinary skill in the art would not be motivated to look to a picture signal processing method that refers to a flag, as disclosed in Hisada, when Isoda relates to a rasterization level that is determined according to a data transmission capacity of the communications unit. The addition of Lowitz exacerbates the problem because one of ordinary skill in the art would not be motivated to look to a printing device for providing plain paper

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prints of video images, as disclosed in Lowitz. The system of Isoda does not motivate one to determine a particular image processing operation as per Hisada, much less to provide plain paper prints of video images as per Lowitz. Therefore, Applicants submit that the combination of Isoda, Hisada, and Lowitz is improper because it lacks motivation. Applicants submit the combination is the result of improper hindsight.

Applicant's submit that neither Hisada nor Lowitz, either alone or in combination, provide the disclosure missing from Isoda, namely a data converter to "**provide printing support even when there is no printer driver compatible with the printer as a target at the printing controller unit**," as recited in claim 1. Indeed, Lowitz teaches away from the instant invention because he provides for a **printer driver** as discussed above (see printer driver 320 in figure 3).

For all of the reasons provided above, Applicants respectfully request that the rejection of claim 1 be withdrawn.

For reasons similar to those described above with regard to independent claim 1, independent claims 5, 9, 13, 17, 22 and 27-33, which recite similar features, are also believed to be allowable.

III.   DEPENDENT CLAIMS

The other claims in this application are each dependent from the independent claims discussed above and are therefore believed patentable for at least the reasons given above. Since each dependent claim is also deemed to define an additional aspect of the invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

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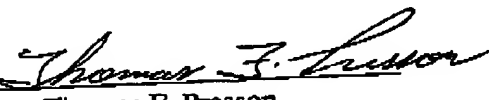Response to Office Action dated June 2, 2005

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CONCLUSION

In the event the Examiner disagrees with any of statements appearing above with respect to the disclosures in the cited references, it is respectfully requested that the Examiner specifically indicate those portions of the references providing the basis for a contrary view.

Please charge any additional fees that may be needed, and credit any overpayment, to our Deposit Account No. 50-0320.

In view of the foregoing amendments and remarks, it is believed that all of the claims in this application are patentable and Applicants respectfully request early passage to issue of the present application.

Respectfully submitted,
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